

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

KEVIN SONNIER, et al.,
Plaintiffs,

v.

THE STATE OF TEXAS,
Defendant.

§ Civil Action No. 3:20-cv-00379

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§ Jury Trial Demanded

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UNOPPOSED MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

On January 27, 2021 in response to the letter of January 15, 2021, and pursuant to this Court's Local Rule of Practice No. 6, Individual Plaintiffs Kevin Sonnier, *et al.*, who appear individually and on behalf of all persons similarly situated (collectively, "Class Plaintiffs"), filed their First Amended Complaint.

Subsequently Plaintiffs discovered items that needed correction in that document. Plaintiffs provided a copy of their proffered Second Amended Complaint (a copy of which is submitted as Exhibit A hereto) to the State and the State does not oppose its filing.

Plaintiffs therefore request this Court grant leave and order the document submitted as Exhibit A to this motion filed as Plaintiffs' Second Amended Complaint.

Dated: January 29, 2021

Respectfully submitted,

/s/ E. Lawrence Vincent

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served on this 29th day of January, 2021, via e-mail to all counsel of record, pursuant to the Federal Rules of Civil Procedure.

/s/ Daniel H. Charest

Daniel H. Charest